

1 projection of the coverage of the Odessa station before it was
2 purchased?

3 A I believe not, sir.

4 Q Were you given information as to what the -- strike
5 that.

6 Insofar as the purchase of the Portland station was
7 concerned, did you ever receive any written information con-
8 cerning the purchase of that station?

9 A Not written, sir.

10 Q Were you ever provided a coverage map or coverage
11 contours of the Portland station?

12 A I believe not, sir.

13 Q Why was the name of the Corporation changed from
14 Translator TV, Inc., to NMTV?

15 A Mr. Cohen, I believe that it was to, to reflect
16 what, what the Corporation was.

17 Q What do you mean, sir?

18 A Well, with the three Directors of the Corporation,
19 Mrs. Duff and I were minorities.

20 Q And, so, you wanted the name "minority" in the name?
21 Is that what you're --

22 A We had some discussion about it and, and I believe,
23 I believe, Mr. Cohen, that one of the reasons was that it, it,
24 it reflected what the Corporation was, sir.

25 Q Meaning you and Duff -- Mrs. Duff were both

1 minorities?

2 A Yes, sir.

3 Q Was, was NMTV the first choice of, of the Board?

4 A I don't think so.

5 Q Do you recall whether the name that was the first
6 choice had the word "minority" in it?

7 A I don't know if it was the first choice. I know
8 that we talked about a few names, but that's the one that was
9 agreed upon.

10 Q But then do you recall whether the first choice had
11 the word "minority" in it?

12 A Well, again, I don't know if there was a first
13 choice, only that there were a number of, of names that we
14 considered.

15 Q Oh, I see. Okay. So, you're, you're not aware
16 whether the, whether the, the names were, were ranked in order
17 of, of preference?

18 A If they were, I, I don't recall that.

19 Q Do you know who, who devised the list of, of, of
20 proposed names?

21 A I don't think I remember, sir.

22 Q Now, prior to the time that you were deposed in
23 California, do you recall discussing with anyone whether you
24 and Mrs. Duff had disagreed with Paul Crouch on any matters
25 concerning NMTV?

1 A If it was discussed with anyone?

2 Q Prior to the time that you were deposed on September
3 24th in California.

4 JUDGE CHACHKIN: That was 1993.

5 BY MR. COHEN:

6 Q 1993. Yes. And I'm asking you prior to the time
7 you were deposed. So, that's prior to September 24, 1993. Do
8 you recall discussing with anyone in the world whether you and
9 Mrs. Duff had disagreed with Paul Crouch on any matters con-
10 cerning NMTV?

11 A Yes. I believe I brought it up in a meeting with --
12 it could have been the first meeting with Mr. Dunne or, or the
13 time I met with Mr. Dunne and Mr. Topel in my office.

14 Q Was this prior to your deposition in California or
15 after?

16 A Oh, no. Prior.

17 Q Prior to. And you, and you have a clear recollec-
18 tion of, of bringing it up with -- at that time?

19 A Yes, sir.

20 Q Now, there was a gap between the time you were
21 deposed in California and the time you were deposed in
22 Washington. You were deposed in California September 24,
23 1993, and you were deposed in Washington October 13th. Do you
24 recall that?

25 A Yes, sir. The weather was --

1 JUDGE CHACHKIN: Also in 1993.

2 MR. COHEN: 1993.

3 MR. ESPINOZA: The weather was much nicer also.

4 BY MR. COHEN:

5 Q It certainly was. Now, during that period of time,
6 did you discuss with anyone any disagreements that you and
7 Mrs. Duff had had with Paul Crouch regarding NMTV business?

8 A Prior to coming to --

9 Q During the interim, between the time you were depo-
10 sed in California and the time you were deposed in Washington?

11 A I don't think so. I don't recall, but I don't think
12 so.

13 Q Now, isn't it true that at the time you were deposed
14 in Washington that you did not recall or testify about any
15 disagreement with Paul Crouch concerning the sale of the
16 Houston construction permit.

17 MR. TOPEL: I object. How, how can the witness
18 remember his entire deposition transcript? That was --

19 MR. COHEN: I want his best rec-- no, Your Honor.
20 I, I want his best recollection. He can recall -- it's a fair
21 question to ask him what he recalls. If he doesn't recall, he
22 can say he doesn't recall.

23 JUDGE CHACHKIN: Overruled.

24 BY MR. COHEN:

25 Q Let me ask you the question again. The Judge has

1 ruled and you, you -- isn't it true that at the time you were
2 deposed in Washington that you didn't recall or didn't testify
3 about the disagreement concerning the sale of the Houston
4 construction permit?

5 A If, if that's what the record shows, Mr. Cohen, I
6 will accept it.

7 Q Well, let me tell you what the record states, and
8 that I'm referring to page 135 of your deposition. And I ask
9 you at line 10. You testified in response to questions from
10 Mr. Shook about the sale that you -- strike that. I'm sorry.

11 You testified in response to questions from Mr.
12 Shook about the time that you disagreed with Paul Crouch about
13 the sale of Odessa. Do you recall that? And I am not going
14 to review that testimony, but he went through the Minutes with
15 you and your answer was: "Yes, sir." And the question was:
16 "Do you remember that?" And the answer was: "Yes, sir." And
17 then the question is -- strike that.

18 And then my question is: "Do you have any recollec-
19 tions of any other disagreements with either Paul Crouch or
20 Jane Duff concerning Translator TV, Inc., or NMTV?" Answer:
21 "Mr. Cohen, it's very possible that there were. Right now I
22 don't remember that."

23 Now, apparently, your recollection was refreshed.
24 Is that correct? Concerning disagreements that you had with
25 Paul Crouch regarding the Houston construction permit sale?

1 JUDGE CHACHKIN: Houston are we talking about or
2 Odessa?

3 MR. COHEN: No. Houston, Your Honor.

4 JUDGE CHACHKIN: All right. Go ahead. I thought
5 there was a reference in the deposition to your remembering
6 something about objections in, in --

7 MR. COHEN: He remembered --

8 JUDGE CHACHKIN: -- Houston.

9 MR. COHEN: He remembered that there was a dispute
10 about Odessa.

11 JUDGE CHACHKIN: I thought you said Houston --

12 MR. COHEN: Well, let me just --

13 JUDGE CHACHKIN: -- when you read it.

14 MR. COHEN: Let me explain it.

15 JUDGE CHACHKIN: All right.

16 MR. COHEN: But his testimony now deals with a
17 dispute about Houston.

18 JUDGE CHACHKIN: I understand that, but I thought
19 when you read the deposition I thought you referred to
20 Houston, not Odessa.

21 MR. COHEN: No, I stated -- I, I did mention Odessa,
22 and then I said: "Do you have any recollections of any other
23 disagreements with either Paul Crouch or Jane Duff -- "

24 JUDGE CHACHKIN: All right.

25 MR. COHEN: " -- concerning Translator TV, Inc., or

1 NMTV?"

2 JUDGE CHACHKIN: All right.

3 MR. COHEN: And the answer was: Mr. Cohen, it's
4 very possible that there were. Right now I don't remember
5 that."

6 JUDGE CHACHKIN: All right.

7 BY MR. COHEN:

8 Q And I'm asking you, pastor, was your recollection
9 refreshed on this point, that is, the disagreement that your
10 testimony says you had with Paul Crouch concerning the sale of
11 the Houston construction permit?

12 A I don't think it was so much a matter that it was
13 refreshed, Mr. Cohen. These are things that, that they seem
14 like another lifetime ago. But in, in, in the depositions
15 and, and in these hearings or, or the depositions, you try and
16 start focusing on, on events. Some things I, I don't remem-
17 ber. Some things, after the deposition, for example, as I
18 started thinking about it, then I would remember them. So,
19 it, it, it's, it's, it's just a matter that some things you
20 remembered, some things you didn't. Later on you would think
21 about it. That's all.

22 Q I -- all I want to find out, pastor, is how it came
23 about that at your deposition you didn't remember, and in your
24 testimony, your testimony is quite clear? What I'm trying to
25 find out is what occurred to make your memory so clear in your

1 testimony, while at your deposition you said at line 41, "Mr.
2 Cohen, it's very possible that there were. Right now I don't
3 remember them." Can you help me on that?

4 A Sure. Well, it's just like I said. The deposition
5 kind of forces you to start reliving or refocusing on some of
6 those events. Some things at the deposition I didn't remember
7 and later on, in, in, in going home or days later, then you,
8 you keep thinking about those events. And it came to mind,
9 sir.

10 Q But no one refreshed your recollection?

11 A Not to the best of my recollection, sir, no.

12 Q Now, I want to show you a document that's admitted
13 into evidence and ask you if you've seen it before. And what
14 I'm showing you is Tab A to Mrs. Duff's testimony. You don't
15 have that in front of you.

16 A No, sir.

17 Q This was attached to Mrs. Duff's testimony?

18 A Yes, sir.

19 Q This is evidence in this proceeding. And spend a
20 minute and look at that, if you will.

21 A Yes, sir.

22 Q Now, you'll notice that that letter is directed to
23 Colby May and you were not copied.

24 A No, sir.

25 Q Have you ever seen that letter before this very

1 minute?

2 A No, sir.

3 Q Are you -- were you aware until this minute, at this
4 very instant, that this letter was ever written?

5 A I was not aware of it, sir.

6 Q And no one's ever described it to you?

7 A No, sir.

8 Q Or told you about it?

9 A No.

10 Q So, this -- is this letter -- this is new news to
11 you insofar as this, this letter's concerned? This is the
12 first time you were ever --

13 A This is --

14 Q -- aware of it?

15 A -- the first time I've seen this letter, sir.

16 Q Now, is this letter -- strike that. Do you, do you
17 notice that Mrs. Duff in writing to Colby May said, "Paul and
18 I did not agree on the selling of the permit."?

19 A Yes, sir.

20 Q "He, he would liked to have built the station,
21 selling it later, but we had too much going on." And you
22 notice there's, there's no reference to, to you in that. It
23 doesn't say that: Paul and David and I. Does this letter
24 help your recollection at all as to what the events were
25 concerning the sale of the Channel 56 construction permit?

1 MR. TOPEL: I object. I think the question is vague
2 -- there's, there's no credit given --

3 JUDGE CHACHKIN: Well, you, you could ask him if a
4 scrap of paper helps him recall the events.

5 MR. COHEN: Yes, of course.

6 MR. TOPEL: But --

7 JUDGE CHACHKIN: You can refer to anything to ask
8 him if it does or it doesn't help him recall the events.

9 MR. COHEN: Of course. You --

10 JUDGE CHACHKIN: Perfectly --

11 MR. COHEN: He --

12 JUDGE CHACHKIN: -- proper question.

13 MR. COHEN: The Judge --

14 JUDGE CHACHKIN: The objection is overruled.

15 BY MR. COHEN:

16 Q The Judge is permitting the question. Go on --

17 A Sure.

18 Q -- and answer. Okay. I'm trying to help your
19 recollection, pastor, of the --

20 A Mr. Cohen, thank you very much.

21 Q That's all I'm trying to do. Because you've told me
22 yourself that --

23 A Sure.

24 Q -- one's recollection is not perfect.

25 A Sure.

1 Q This is a, this is a matter that, that's referred to
2 in your testimony. Does this letter help you recall.

3 A Mr. Cohen, not necessarily, because later on I did
4 remember that this is something that Mrs. Duff and I had
5 talked about and we were not in agreement with, with Mr.
6 Crouch. I had not seen this letter before, sir, but I do know
7 later on I recall that Mrs. Duff and I had talked about it
8 and, and that we were just not in agreement.

9 Q So, this letter doesn't help your recollection of
10 the event?

11 A It's something I had already remembered, sir. Do
12 you want this back, Mr. Cohen?

13 Q No, you can keep it. You can keep it. Now, I want
14 you to refer to paragraph 18 of your testimony. Let me help
15 you find it. Would you read to yourself paragraph 18? Tell
16 me when you've read it.

17 (Pause.)

18 MR. ESPINOZA: Yes, sir.

19 JUDGE CHACHKIN: Before you begin this area, let's
20 take a ten-minute recess.

21 MR. COHEN: Thank you, Your Honor.

22 (Whereupon, a short recess was taken from 10:45 a.m.
23 until 10:58 a.m.)

24 JUDGE CHACHKIN: Mr. Cohen.

25 BY MR. COHEN:

1 Q Pastor, I wanted to ask you about paragraph 18.
2 Now, the -- that paragraph has some factual -- there's some
3 factual statements in there such as "two full-power stations"
4 and there's other factual material. Is that factual material
5 material that you were aware of or is it material that Mr.
6 Dunne made you aware of?

7 A Mr. Dunne or Mrs. Duff?

8 Q No, Mr. Dunne, in terms of the preparation of this
9 paragraph. This was -- somebody sat down and wrote this
10 paragraph.

11 A No, no. Not at all, sir.

12 Q So, you, you -- this is your, this is your language
13 in paragraph --

14 A Yes, sir.

15 Q -- 18?

16 A Mrs. Duff and I had talked about it.

17 Q No, I'm confusing you. I'm now talking about the
18 preparation of your testimony, this document. I'm talking
19 about preparing your testimony.

20 A Which, which is before you.

21 Q Paragraph 18, someone had to sit down and write
22 that.

23 A When I met with -- and, again, when I met with -- it
24 was either Mr. Dunne alone or Mr. Dunne and Mr. Topel. As I
25 was talking, if memory serves me right, it was Mr. Dunne that

1 was taking notes on what I was saying, sir.

2 Q Okay. So, what Mr. Dunne did was take notes of what
3 you told him and that's what's set forth in paragraph 18?

4 A Yes, sir.

5 Q Okay. So, all the information in paragraph 18 came
6 from you then?

7 A Yes, sir.

8 Q And none of it came from anywhere else?

9 A Oh, no, not at all, sir.

10 Q That's what I wanted to find out. Okay. Now, first
11 of all, turning to the first sentence, "The Corporation
12 now..." Do you see that? Your -- in paragraph 18? What does
13 "now" mean in terms of time? What dates? Approximately what,
14 what, what were you -- what are you talking about? What's the
15 date that "now" means?

16 A I believe we're referring to a time-frame of, of,
17 what, '87, something like that.

18 Q Well, I want to be fair to you. So, read paragraph
19 17 to yourself.

20 A Okay.

21 Q I want to give you every --

22 A Sure.

23 Q -- opportunity. I'm not trying to trick you, pas-
24 tor. Believe me, that's not my intention.

25 A You promise, Mr. Cohen?

1 Q I give you my word.

2 A Okay.

3 Q It's not my, it's not my intention.

4 A Okay. I'll take your word for it.

5 Q As an Officer of the Commission, I'll represent that
6 to you.

7 A Yes, sir.

8 Q Now, my question is what does "now" refer to?

9 A I think I was thinking in terms of -- we now have --
10 at the time that Mr. Crouch wants to build the station, I felt
11 that presently we were taking our first steps and I just
12 wanted to take it slowly.

13 Q So, there's, there's no -- strike that. Can, can
14 you give me your best estimate of what the date -- what date
15 that would be when, "The Corporation now had two full-power
16 stations under construction..."?

17 A At this time, right now I'm thinking in terms of
18 1988.

19 Q Okay. Now --

20 JUDGE CHACHKIN: We identify what are these two
21 full-power stations that you have in mind?

22 MR. COHEN: Thank you, Your Honor. The -- your
23 point is well-taken.

24 BY MR. COHEN:

25 Q What are the two full-power stations under

1 construction?

2 A Odessa and Portland, sir.

3 Q When did construction start for Odessa?

4 A I, I, I'm guessing sometime --

5 Q Don't, don't guess. If you don't know or you can't

6 give me a reasonable --

7 A No, I, I --

8 Q -- estimate --

9 A -- can't remember, sir.

10 Q Do you know when construction started for Portland?

11 A That I don't recall either, sir.

12 Q When was construction completed for Odessa?

13 A I don't remember, sir.

14 Q When was construction completed for Portland?

15 A Nor do I remember.

16 Q Now, it states that, in this first section, "The

17 Corporation had two full-power stations under construction as

18 well as a few translator authorizations." Do you see that?

19 A Yes, sir.

20 Q How many translator authorizations were there?

21 A I'm thinking of Fresno -- that's what I remember

22 right now, Mr. Cohen.

23 Q Well, when you say "few," that indicates to me more

24 than one.

25 A I understand, but right now that's what I remember,

1 | sir.

2 | Q But at the time that paragraph 18 was drafted, do
3 | you recall more than one?

4 | A Fresno, Concord -- Concord is something that Mrs.
5 | Duff and I had talked about.

6 | Q Was Concord a, a --

7 | A I'm sorry.

8 | Q -- translator --

9 | A Concord, California.

10 | Q Was Concord a translator authorization or was that a
11 | full-power station?

12 | A I, I -- no. I don't remember right now, Mr. Cohen.
13 | I remember Fresno was low-power.

14 | Q All right. And that's all you can recall?

15 | A Right now, that's all, sir.

16 | Q The, the construction permit for the community in
17 | the Houston area, what, what community was that -- was the
18 | community of license?

19 | A If -- Mr. Cohen, if memory serves me right, it was
20 | Stafford, I believe.

21 | Q Now, you state here, "Mrs. Duff called me during
22 | this time period." What -- when did she call you?

23 | A Prior to the meeting, sir.

24 | Q And, and, so, you're talking about she called you
25 | prior to the meeting. When did the meeting occur?

1 A Article 17 says December 12, 1988, sir.

2 Q Did she call you just about -- strike that. Now, I
3 want to -- I -- is it your, is it your testimony -- I'm con-
4 fused, doctor -- I mean, pastor.

5 When you said that she called you at about the time
6 of the meeting, are you referring to the meeting that's refer-
7 enced at paragraph 17, the meeting that occurred on
8 December 12, 1988?

9 A That, that's what I was looking at, Mr. Cohen.

10 Q And --

11 A But --

12 Q Excuse me. I didn't mean to cut you off.

13 A No. I, I was looking at number 17. But it's very
14 difficult for me to, to focus on, on times.

15 Q Well, what I was trying to find out is when, when,
16 when you wrote paragraph 18 and it stated that -- you state
17 here that, "Mrs. Duff called me during this time period," I, I
18 simply want to find out what you meant by "this time period."

19 A I think I just meant at, at that time. I, I don't
20 think I had any great significance in that. Just that Mrs.
21 Duff had called me.

22 Q So, you can't recall when she called you?

23 A No. Right now I can't, sir.

24 Q And it could have been in 1988 or it could have been
25 in 1989?

1 A Right now I don't recall, Mr. Cohen.

2 Q Now, the -- but you, but you have a, a clear recol-
3 lection of when -- of her calling you? That's clear in your
4 mind?

5 A Yes, sir.

6 Q Did she call you about just this matter of selling
7 the construction permit or did she talk to you about other
8 things?

9 A I don't know, Mr. -- I don't remember, Mr. Cohen.
10 I'm not -- there could have been other things, but I honestly
11 don't remember, Mr. Cohen.

12 Q But you have a specific recollection of the
13 telephone call?

14 A Yes, sir.

15 Q Remember anything about the phone call in particular
16 that you can tell me about?

17 A No, sir.

18 Q Was it a long call or a short call? I mean, I'm
19 trying to help your memory. Do you have any recollection of
20 the duration of the phone call?

21 A No, sir.

22 Q Do you remember where you were when she called you?

23 A Either my office or at home.

24 Q Now, I want you to continue on in reading through
25 the paragraph where you say, "In addition, although I knew

1 that Houston had a large Hispanic population, the station was
2 a low-power station and was not as strong as we wanted." Do
3 you see that?

4 A Yes, sir.

5 Q How strong was the station?

6 A I don't recall, sir.

7 Q What was the power?

8 A I don't recall, sir.

9 Q Did the station put a watchable signal over Houston?
10 Strike that question.

11 Would it have put, would it have put a watchable
12 signal over Houston?

13 A Mr. Cohen, at this point I really couldn't say.

14 Q You say here that "...the, the station was a low-
15 power station and not as strong as we wanted." Do you see
16 that?

17 A Yes, sir.

18 Q How strong did you want the sta-- the, the -- how
19 strong did you want it to be?

20 A Well, strong enough so that it could give a, a clear
21 picture and, and give out a, a, a wider scope of, of reachabi-
22 lity.

23 Q But you don't know whether it would have reached
24 Houston as it, as it was authorized?

25 A Right now I don't remember, sir.

1 Q Do you know how much the CP was sold for?

2 A I don't recall, Mr. Cohen.

3 Q Let's change the subject, if I could, and ask you
4 about paragraph 15 of your testimony. Now, you state in the
5 second sentence that the Odessa sale had just been closed. Do
6 you see that? Mr. Dunne or someone else gave you that infor-
7 mation, because you didn't know that, did you?

8 A It's very possible that -- well, I'm sure it came up
9 in conversation.

10 Q I'm talking about your conversation with Mr. Dunne
11 concerning the preparation of paragraph 15. You had no knowl-
12 edge, did you, that the Odessa sale had just been --

13 A I, I don't think I recall, Mr. Cohen, and it's very
14 possible that, that I asked Mr. Dunne if, if he remembered
15 when it was --

16 Q So, that information must have come from him, am I
17 right?

18 A It must have, yes, sir.

19 Q Because you don't -- you never knew that?

20 A I didn't recall. No, it's not that I didn't know,
21 it's that I didn't recall, Mr. Cohen.

22 Q You didn't recall. Excuse me. Your point's well-
23 taken. Do you know when the Odessa station went on the air?

24 A Mr. Cohen, it was either '88 or '89, if memory
25 serves me right.

1 Q Do you know how long NMTV owned the station?

2 A I do not recall, Mr. Cohen.

3 Q I want you to look at Mass Media Bureau Exhibit 147.
4 That would be in Volume No. 3. I think we should put Volume 1
5 back here.

6 A Okay.

7 Q Otherwise you'll have so much paper you'll never be
8 able to deal with it.

9 A Thank you, Mr. Cohen.

10 Q Now, that's what I was going to ask you about.
11 Spend a moment -- I'm going to be asking you about the sub-
12 stance of that document, so spend a minute and, and -- or not
13 a minute, spend --

14 A Would you like me to read the whole thing?

15 Q Yeah, you should --

16 A Okay.

17 Q -- because I want to ask you -- spend as much time
18 as you need.

19 (Pause.)

20 MR. ESPINOZA: Sir.

21 BY MR. COHEN:

22 Q What, what I'm, what I'm -- what I want to ask you
23 about is the Odessa station, the con-- the construction --
24 strike that.

25 The, the idea of NMTV building a station at Odessa

1 was a very important idea for you, wasn't it?

2 A Yes, sir.

3 Q And, and you were deeply committed to that concept,
4 weren't you?

5 A Yes, sir.

6 Q And you were committed to the idea that Hispanics
7 could be served by the Odessa station?

8 A Yes, sir.

9 Q And that was a, a cause that you felt very strongly
10 about?

11 A Yes, sir.

12 Q And, and you were aware because you had a relative
13 that preached in that area for some time?

14 A Yes, sir.

15 Q So, you had some knowledge that there was a large
16 Hispanic population in Odessa?

17 A Yes, sir.

18 Q And, so, you were very pleased when the Corporation
19 obtained the construction, the construction permit and built
20 the station?

21 A That's correct, sir.

22 Q And what I, what I want you to explain for the
23 record is here we have a meeting on June 22, 1987, and in
24 January it had been -- strike that.

25 MR. COHEN: Can I have a minute, Your Honor, to find

1 something?

2 BY MR. COHEN:

3 Q In January of '87, the Corporation had decided to
4 buy the construction permit for Odessa. You can accept that
5 as a fact. And here we are in June of 1987, just a handful of
6 months later, and there is very serious discussion about
7 selling the construction permit. I'm trying, I'm trying to,
8 to, to mention those facts to help your recollection.

9 A Yes, sir.

10 Q Now, do you have a, a recollection of, of, of this
11 June 22, '87, Board meeting when Paul Crouch suggested that
12 the construction permit be sold?

13 A Yes, sir.

14 Q Do you have -- did, did you have any understanding
15 then as to what was going on in terms of NMTV as a Corporation
16 to -- for the Corporation to acquire the construction permit
17 in January and then in June giving serious consideration to
18 selling it?

19 A The Corporation or Mr. Crouch?

20 Q Well, there was consideration being given to selling
21 it. Mr. Crouch was the one who was suggesting it, yes. Did
22 that concern you?

23 A I don't think -- in, in looking back at it, Mr., Mr.
24 Cohen, it was something that was discussed, but not with any
25 approval or with much success or --

1 Q You mean that the Corporation did not then decide
2 to, to sell the construction permit?

3 A Yes, sir.

4 Q But you were very much against that, weren't you?

5 A That's correct, sir.

6 Q And you wanted the station to be built?

7 A Yes, sir.

8 Q Now, wasn't it always your intention that the
9 Houston station should act as a -- particularly as a service
10 to the Hispanic community?

11 MR. TOPEL: Objection.

12 JUDGE CHACHKIN: The Houston or Odessa?

13 MR. COHEN: Excuse me. Odessa. Excuse me. I'm
14 sorry. I misspoke. Thank you.

15 BY MR. COHEN:

16 Q The Odessa station should act as a, a vehicle to
17 serve the, the Spanish community -- Hispanic community?

18 A I had hope that, that every station, sir, low-power
19 or -- but that is, that is correct, sir.

20 Q And didn't you particularly want there to be local
21 programming which could spread the gospel to people who needed
22 the message in the Odessa area?

23 A I've always been of the conviction that regardless
24 of where the station is at if you have local programming, it
25 creates more interest because people can identify better with

1 the person that has the program.

2 Q And, so, that was a, that was a matter that was of
3 great concern to you?

4 A Yes, sir.

5 Q And did you express those concerns at this June 22nd
6 Board meeting?

7 A I believe I did, sir.

8 Q And you prevailed? That is, you and Mrs. Duff just
9 outvoted Paul Crouch?

10 A Yes, sir.

11 Q Now, did you ever waiver in your conviction that the
12 service to the Hispanics in the Odessa area was, was vital to
13 NMTV's mission?

14 A At that meeting?

15 Q Did you ever waiver in your conviction that service
16 to the Hispanics in the Odessa area was vital to NMTV's
17 mission?

18 A But at that -- are you talking about that meeting --

19 Q --

20 A -- or just in generalities?

21 Q --

22 A I think later on, and it wasn't so much a matter of,
23 of wavering in my convictions, but it was a matter of, of I
24 felt that in order for the station to continue there had to be
25 more support, and I don't think we were receiving it, sir.

FREE STATE REPORTING, INC.

Court Reporting Depositions

D.C. Area (301) 261-1902

Balt. & Annap. (410) 974-0947